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Inc.

7
8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA
10

11 TACHARA HUGHES,
12 Plaintiff,

13 vs.

14 SOUTHERN HILLS MEDICAL CENTER,
LLC, a Nevada Limited Liability Company;
15 Does I-X; Roe corporations I-X,
16 Defendants.
17

CASE NO. 2:16-cv-01997-JAD-PAL

**STIPULATION TO EXTEND TIME TO
FILE JOINT PRETRIAL ORDER
(FOURTH REQUEST)**

18 Plaintiff, TACHARA HUGHES, and Defendant, SOUTHERN HILLS MEDICAL
19 CENTER, LLC, by and through their respective counsel of record, hereby stipulate and agree to
20 extend the deadline to file a Joint Pre-Trial Order (originally June 15, 2018 per ECF No. 49), up
21 to and including **July 20, 2018**.

22 Good cause exists for the requested extension. On May 25, 2018, the parties participated
23 in a status check for the mandatory settlement conference and were unable to resolve this matter.
24 At that time, Magistrate Judge Leen ordered the parties to file the Joint Pretrial order by June 11,
25 2018. See (ECF No. 47). The parties have been working on the Joint Pre-Trial Order but there
26 have been difficulties coordinating review and discussion as a result of counsel for Plaintiff
27 traveling and being out of the state for a significant portion of the last few weeks due to both
28 work and personal reasons. See (ECF Nos. 48 and 49). Most recently, the parties again

1 requested additional time from this Court to meet and confer on the contents of the Joint Pre-
2 Trial Order when counsel for Plaintiff was traveling and did not return to the office until July 2,
3 2018. See (ECF No. 50, requesting extension of time until July 5, 2018).

4 The parties recognize and acknowledge this Court's caution and admonition in Order
5 (ECF No. 49) that the work load of counsel would not constitute good cause for further extension
6 of this deadline. The parties assure the Court that neither the Third Request (ECF No. 50) nor
7 this Fourth Request were based on the work load of counsel. This final extension is requested
8 because newly substituted Defense counsel has been having difficulty identifying and reviewing
9 documents received from prior defense counsel in order to properly assess necessary trial
10 exhibits and has not been able to finalize its exhibit list by the requested July 5, 2018 extended
11 deadline. Counsel for Plaintiff will also again be out of town from July 6, 2018 to July 13, 2016
12 for a family gathering. Under the circumstances, the parties stipulate to and request one last
13 extension of time to submit the Joint Pretrial Order up to and including **July 20, 2018**. There
14 will be no further requests for extensions.

15
16 DATED this 5th day of July, 2018.

DATED this 5th day of July, 2018.

17 LEWIS BRISBOIS BISGAARD
18 & SMITH LLP

KEMP & KEMP

19
20 By /s/ Bruce C. Young
21 BRUCE C. YOUNG, ESQ.

/s/ James P. Kemp
JAMES P. KEMP, ESQ.

22 Attorneys for Defendant

Attorneys for Plaintiff

23
24 **IT IS SO ORDERED.**

25 
26 UNITED STATES MAGISTRATE JUDGE

27 DATED: July 6, 2018